



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101  
APR 10 1989

WA 0342  
4/10/89  
~ 25' to 6w  
172  
32

REPLY TO  
ATTN OF: HW-112

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Doug Hardesty  
Hillman Properties Northwest  
2000 E. Columbia Way  
Vancouver, Washington 98661

Re: Notice of Deficiency for Building #5 Closure Plan

Dear Mr. Hardesty:

The U.S. Environmental Protection Agency (EPA) Region 10, Waste Management Branch and Washington Operations Office have reviewed the closure plan submitted by Hillman Properties Northwest for performance of the Resource Conservation and Recovery Act (RCRA) at Building 5 in the Columbia Industrial Park, Vancouver, Washington. This review was performed pursuant to Consent Agreement and Final Order docket number 1088-01-01-3008 and 40 CFR 265 Subpart G. In addition, an in-depth review of the existing groundwater monitoring system for the site was conducted to assess its adequacy for certifying clean closure. This was done in accordance with 40 CFR 265 Subpart F. Both reviews uncovered deficiencies which must be corrected. We request that the closure plan be modified to fully address the following deficiencies.

- An estimate of the maximum inventory of hazardous wastes was not provided.
- The plan did not identify the transporter or the treatment or disposal facility that would be used should it be necessary to remove material from the site during closure.
- The plan does not contain a discussion of back filling procedures should removal of soil be necessary.
- The plan did not discuss site security during closure.
- A topographic map of the site was not provided with the plan.
- According to the plan, equipment decontamination rinsewaters will be discharged to the storm sewer. A sampling plan for sampling of the rinsates prior to discharge was not included in the closure plan.

USEPA RCRA



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- In the site history provided in the closure plan, Table 1-1 indicates that AGI found 1606 ppm of lead in grid A-5. Even though this area was excavated, this grid should be sampled again to confirm that it is clean.
- Current information provided to EPA on the groundwater monitoring system does not answer the following questions:
  1. What criteria was used in selecting well placement and does the well network adequately cover the potentially contaminated area?
  2. What is the nature, areal extent, and geometry of the silty gravel aquitard to the north and east of the site?
  3. Where are the buried utility lines crossing the land disposal area and what role do these lines play in contaminant migration at the site?
  4. Is the hydraulic fill aquifer the uppermost aquifer?
  5. What is the potential for contaminant migration along the fill/silty gravel contact?
  6. What is the direction of groundwater flow across the site during high water periods (winter and spring)?
  7. What is the total thickness of the sand aquifer?

This information is needed to determine the adequacy of the existing system for sampling of the groundwater to certify clean closure.

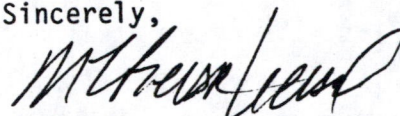
The revised closure plan should be submitted to EPA, Region 10, within 45 days of your receipt of this letter.

If you have any questions contact Jack Boller at (206) 753-9428.

All submittals must be sent to:

C.A. Shenk, Chief  
RCRA Compliance Section  
Environmental Protection Agency  
1200 Sixth Avenue (HW-112)  
Seattle, Washington 98101

Sincerely,



Michael F. Gearheard, Chief  
Waste Management Branch